

633 West Fifth Street
Floor 28
Los Angeles, CA 90071



June 22, 2018

Attorneys At Law
Nazareth M. Haysbert
James Moultrie III
hmlaw.la

VIA FAX, EMAIL, AND CERTIFIED MAIL

Michael Bellomo
Director of Risk Management
Bloomin' Brands, Inc.
michaelbellomo@bloominbrands.com
2202 N. West Shore Blvd., Suite 500
Tampa, FL 33607

Re: **Our Client:** JoAnn Wright Haysbert
Claim No.: Tristal Spidola (813- 813-830-4992) and Lisa Crosby Have
Not Provided a Claim Number Despite Repeated Requests
Date of Loss: May 23, 2018

Dear Mr. Bellomo:

Please be advised that our firm represents JoAnn W. Haysbert, who was injured in an accident at the Outback Steakhouse located at 4312 Portsmouth Blvd. Chesapeake, Virginia 23321, on the above date. Our investigation indicates that your company is legally responsible in this matter.

A copy of Designation of Counsel will be provided for your file upon request.

In the event you have obtained a statement from our client, please provide us with a copy within ten (10) days of receipt of this letter via fax (310-424-7140), email (nazareth@hmlaw.la), and postal mail at the address listed in the header above. If medical authorizations have been extended to you, please consider any such authorizations to be rescinded.

We do not have sufficient medical information at this time to discuss settlement, but we would be pleased to do so when this information is available. Please acknowledge receipt of this letter and provide us with a copy of the declarations page and applicable insurance policy for your insured within ten (10) days.

This letter serves as formal notice of your duty to preserve all evidence related to the date of loss and the accident which occurred, even without a court order. This requirement relates to all paper and electronic records, and data existing or created in any medium.

We demand that you identify, secure, preserve, safeguard, maintain, and preserve any and all hard copy documents, audio recordings, videotape, email, instant messages, word processing documents, spreadsheets, databases, calendars, telephone logs, contact manager information, internet usage files, and all other electronic information, documents and/or data, including electronic data, maintained, created, or received by your company, which relates in any way, direct or indirect, to the accident that occurred on the above date.

We further demand that you immediately suspend the deletion, overwriting, or any other possible destruction of all such hard copy documents, audio recordings, videotape, email, instant messages, word processing documents, spreadsheets, databases, calendars, telephone logs, contact manager information, internet usage files, and all other electronic information, documents and/or data, including electronic data. Because electronically stored information ("electronic data" or "ESI") may be an irreplaceable source of discovery in this matter, it is your duty to preserve all potentially relevant electronic data.

Finally, it is your responsibility to ensure that all sources of information which relates in any way, direct or indirect, to the accident that occurred on the above date, including physical documents, thumb-drives, company furnished laptops, PDAs used by employees for business purposes, and ESI, are preserved and maintained in native format.

Please refrain from contacting Mrs. Haysbert from this point forward, as we have provided notice of representation and such contact may constitute harassment. Please direct all future correspondence to my office. Your professional cooperation in this matter is appreciated.

We look forward to working with you in this matter.

Respectfully,

HAYSBERT MOULTRIE LLP



NAZARETH M. HAYSBERT

cc:

Chip Chase, Managing Partner
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